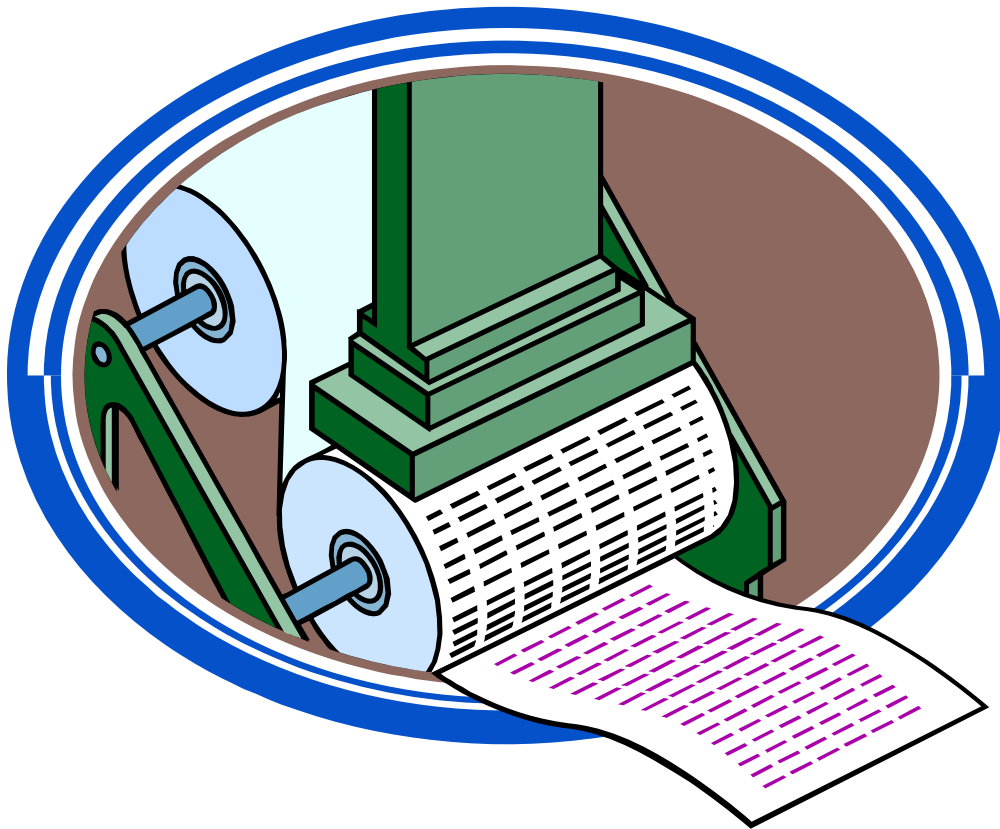


Wisconsin Printers
Environmental Compliance
Assistance Workbook



For use with Wisconsin Department of
Natural Resource's *Environmental Results
Program for Printers*

Acknowledgements

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Preface

Environmental laws and regulations are complex and difficult to understand. Most regulations are not written for one particular industry. Rather, they apply to a diverse group of businesses and industries. As a result, small businesses must understand and comply with the same rules as large corporations. The problem is, most large corporations have staff trained specifically to work in environmental matters, and most small businesses, like screen printers, do not.

This workbook will help Wisconsin's smaller printing facility owners and operators understand their regulatory obligations. Although the book focuses on environmental requirements, it also contains information about related topics such as health and safety standards, emergency planning and hazard communication, and pollution prevention tips. Regulations are simple to understand and easy to implement when you use this workbook.

The workbook is one of a two-part compliance assistance package.

Part 1 – ***Wisconsin Printers Compliance Assistance Workbook*** – This workbook explains the environmental standards that apply to your facility, and how to make sure you are complying with them. The workbook is designed to be used in conjunction with the accompanying self-certification checklist and can also be used as a reference for day-to-day operations. The workbook also provides information regarding best management practices and pollution prevention techniques that can help your facility minimize health risks and environmental impacts while saving money.

Part 2 – ***Wisconsin Printers Environmental Compliance Self-Certification Checklist*** – This checklist contains a series of compliance questions, which generally require “yes” or “no” answers about whether your facility is following the applicable environmental requirements. After completing the checklist, you will know your facility's compliance status. Some printers may discover areas where their facility is not in compliance. Included with the checklist is a Return to Compliance Plan you can use to:

- Identify any specific violations.
- Assign an employee responsibility to correct the violation.
- Track your progress in remedying the violation.
- Certify the violation has been corrected.

Introduction to the Environmental Results Program

The Environmental Results Program (ERP) is designed to help printers in Wisconsin improve their environmental performance. Participating in the ERP ensures that printers comply with all state and federal requirements addressed in the Wisconsin Printers Environmental Compliance Assistance Workbook. In addition, ERP participants are provided with an air pollution Registration Operation Permit written specific to printers, the use of the Audit Immunity program in the Green Tier law, as well as some consolidation of records and reporting requirements.



The Department of Natural Resources (DNR) Air Program invited the Department of Commerce Small Business Clean Air Assistance Program (SBCAAP) and the printing trade associations of PIW/GATF and SGIA to participate in a joint project to develop and implement a pilot Environmental Results Program (ERP) for Printers in Wisconsin. This work is being supported by a State Innovations Grant awarded to the DNR by the US Environmental Protection Agency (EPA). Together we will help smaller printers to work and grow in Wisconsin while improving their environmental performance.

This workbook will explain how to certify compliance with environmental regulations. The ERP also suggests pollution prevention and best management practices to help printers improve their environmental performance.

If you have any questions about the ERP or while going through the workbook, contact the Commerce SBCAAP at 608-264-6153 or outside the 608 area code call: 1-800-HELP BUSINESS (1-800-435-7287, press 4 when prompted).

Who is eligible to participate in the ERP for printers?

ALL printers with printing operations with a primary Standard Industrial Classification (SIC) Code of 23, 26 or 27 or a primary North American Industry Classification System (NAICS) code of 32311x or 5111x are subject to the ERP standards. There are two exceptions:

-  Manufacturers or other businesses where printing is an ancillary operation.
-  Facilities with emissions of air pollution 25 tons per year of any criteria air pollutant (Volatile Organic Compounds (VOCs), Nitrogen Oxides, Carbon Monoxide, Sulfur Dioxide, Particulate Matter) or 5.0 tons per year of any single Hazardous Air Pollutant (HAPs) or 12.5 tons per year for any combination of HAPs, or more. In this case, you are required to obtain a traditional operation permit from DNR and you are not eligible for ERP. Section A: ERP Eligibility in **Chapter 1: Air Pollution** will help you determine your emissions level.

All printers must comply with the standards in this workbook. Printers who wish to participate in this program and obtain benefits mentioned previously must complete the Compliance Self-certification Form as instructed. If you are not eligible to participate, for either of the reasons above, complete the enclosed “Non-Eligibility Form” and submit it as indicated on the form.

How do I use the Workbook and Checklist?

The ERP Compliance Assistance Package contains:

- Environmental Compliance Assistance Workbook
- Resources in the Appendices (Cyan, Yellow, Magenta, and Black Ink Room sections)

- Environmental Compliance Self-certification Checklist
- Non-eligibility Form
- Return to Compliance Plan Form

There are two possible ways to use this ERP package. It is best if you read through the workbook, generally in the order that it is presented, and follow along with the checklist, answering the questions as you go. If you feel comfortable with the environmental standards and believe you are in compliance, you may prefer to start with the checklist and refer back to the workbook only if you come to a question you cannot answer with certainty.

The Environmental Compliance Self-certification Checklist, the Non-eligibility Form, and the Return to Compliance Plan Form are in a booklet provided separate from this workbook. That booklet contains its own set of instructions on how to use the forms.

Is there anything I should do before I use this workbook?

Using pollution prevention and waste reduction opportunities can be a means of complying with environmental regulations. These practices also increase overall environmental performance and cost competitiveness. Consider reviewing the recommended actions in Part III of the workbook, **Chapter 8: Pollution Prevention and Waste Reduction**, before addressing the regulatory requirements in Parts I and II of the workbook.